



Patrick Masambu
Director General and
Chief Executive Officer

14 November 2017
Ref: 11-14-17/DG-50

The Honorable Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 4.2 GHz* GN Docket No. 17-183

Dear Chairman Pai:

The International Telecommunications Satellite Organization (“ITSO”) is pleased to submit this letter in response to the Federal Communications Commission’s Notice of Inquiry in the above-referenced docket.

ITSO notes the important responsibilities under the terms of the ITSO Agreement that the United States has taken on, as part of the Intelsat restructuring process. These include its designation as a Notifying Administration for the ITSO Parties’ Common Heritage Assets, consisting of the Common Heritage orbital locations and associated frequencies, and the significant role of the Federal Communications Commission in safeguarding those Assets.

A core element of ITSO’s mission is to ensure that Intelsat adheres to the Public Service Obligations set forth in the ITSO Agreement, and in so doing properly utilizes the Parties Common Heritage Assets to continue its provision of public telecommunications services, including voice, data and video, on a global and non-discriminatory basis. Having reviewed the joint proposal of Intelsat and Intel Corporation submitted in this proceeding from this perspective, ITSO shares the sentiment expressed therein that the Commission adopt a “sound policy approach that avoids unnecessary disruption to existing licensed C-band satellite operations” in the 3.7-4.2 GHz band, so as to ensure continued “protection of existing services, such as video programming distribution and service to rural areas that rely heavily on satellite.” *Joint Comments of Intelsat License LLC and Intel Corporation*, GN Docket No. 17-183, at 5.

At this stage in the proceedings, ITSO welcomes the spirit in which the joint Intelsat-Intel proposal was put forward, as a means to consider the important policy issues that have been raised in this proceeding. Further analysis of the proposal must specifically take into account Intelsat’s ability to continue to fulfill its Public Service Obligations under the ITSO Agreement and the United States’ ability to discharge its obligations as a Notifying Administration under the ITSO

Agreement. Moreover, it is necessary to consider any operational and technical effects that such an approach could have on the provision of satellite services in other countries around the world.

ITSO looks forward to working with the Commission through the next stages of this proceeding to ensure preservation of the key objectives identified above.

Sincerely yours,

A handwritten signature in black ink, appearing to read "J. A. and". The signature is written in a cursive, fluid style with a large initial "J" and "A".